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ND-23-0350
10 CFR 52.99(c)(1)

U.S. Nuclear Regulatory Commission
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Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 4
ITAAC Closure Notification on Completion of ITAAC 2.4.01.02 [Index Number 493]

Ladies and Gentlemen:

In accordance with 10 CFR 52.99(c)(1), the purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 4 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.4.01.02 [Index Number 493]. This ITAAC requires testing and inspections be performed to verify that the Main and Startup Feedwater System (FWS) provides 260 gpm of startup feedwater flow from the Condensate Storage Tank (CST) to the Steam Generator System (SGS) for Reactor Coolant System (RCS) heat removal. The ITAAC also verifies that controls exist in the Main Control Room (MCR) and operate to cause the components listed in the VEGP Unit 4 Combined Operating License COL Appendix C Table 2.4.1-1 to perform the listed function. Finally, it verifies that the displays of parameters identified in VEGP Unit 4 COL Appendix C Table 2.4.1-1 can be retrieved in the MCR. The closure process for this ITAAC is based on the guidance described in NEI 08-01, "Industry Guideline for the ITAAC Closure Process under 10 CFR Part 52", which was endorsed by the NRC in Regulatory Guide 1.215.

This letter contains no new NRC regulatory commitments. Southern Nuclear Operating Company (SNC) requests NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

If there are any questions, please contact Kelli Roberts at 706-848-6991.

Respectfully submitted,



Jamie M. Coleman
Regulatory Affairs Director Vogtle 3 & 4

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JMC/PCM/sfr

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cc: Regional Administrator, Region II
 Director, Office of Nuclear Reactor Regulation (NRR)
 Director, Vogtle Project Office NRR
 Senior Resident Inspector – Vogtle 3 & 4

**Southern Nuclear Operating Company
ND-23-0350
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of ITAAC 2.4.01.02 [Index Number 493]**

ITAAC Statement

Design Commitment

2. The FWS provides startup feedwater flow from the CST to the SGS for heat removal from the RCS.
3. Controls exist in the MCR to cause the components identified in Table 2.4.1-1 to perform the listed function.
4. Displays of the parameters identified in Table 2.4.1-1 can be retrieved in the MCR.

Inspections/Tests/Analyses

Testing will be performed to confirm that each of the startup feedwater pumps can provide water from the CST to both steam generators.

Testing will be performed on the components in Table 2.4.1-1 using controls in the MCR.

Inspection will be performed for retrievability of parameters in the MCR.

Acceptance Criteria

Each FWS startup feedwater pump provides a flow rate greater than or equal to 260 gpm to each steam generator system at a steam generator secondary side pressure of at least 1106 psia.

Controls in the MCR operate to cause the components listed in Table 2.4.1-1 to perform the listed functions.

The displays identified in Table 2.4.1-1 can be retrieved in the MCR.

ITAAC Determination Basis

This ITAAC requires testing and inspections be performed to verify that the Main and Startup Feedwater System (FWS) provides 260 gpm of startup feedwater flow from the Condensate Storage Tank (CST) to the Steam Generator System (SGS) for Reactor Coolant System (RCS) heat removal, that controls exist in the Main Control Room (MCR) and operate to cause the components listed in the VEGP Unit 4 Combined Operating License COL Appendix C Table 2.4.1-1 (Attachment A) to perform the listed function, and that the displays of parameters identified in VEGP Unit 4 COL Appendix C Table 2.4.1-1 (Attachment B) can be retrieved in the MCR.

Each FWS startup feedwater pump provides a flow rate greater than or equal to 260 gpm to each steam generator system at a steam generator secondary side pressure of at least 1106 psia.

Testing was performed and results were documented in accordance with Unit 4 Preoperational Test Procedure 4-FWS-ITPP-502 (Reference 1) and ITAAC Technical Report SV4-FWS-ITR-800493 (Reference 2) to verify that each Startup Feedwater pump can provide greater than or equal to 260 gpm to each steam generator system at a secondary side pressure of at least 1106 psia.

Initial conditions were established with the plant at Normal Operating Pressure (NOP) and Normal Operating Temperature (NOT) utilizing the plant general operating procedure. Steam Generator pressure control was placed into Automatic to maintain secondary pressure at 1110

psia and temporary flow instruments were installed on the startup feedwater lines to each steam generator. Main Feedwater flow was stopped, and Startup Feedwater flow was initiated using the A Startup Feedwater pump. Flow was recorded and verified to be greater than or equal to 260 gpm to each steam generator system. This testing was repeated using the B Startup Feedwater pump.

The results of the testing showed that the Unit 4 A startup feedwater pump provided 313 gpm to the steam generator 1 and 324 gpm to the steam generator 2 and the B startup feedwater pump provided 322 gpm to the steam generator 1 and 314 gpm to the steam generator 2.

This testing confirmed that for Unit 4 each FWS startup feedwater pump provided a flow rate greater than or equal to 260 gpm to each steam generator system at a steam generator secondary side pressure of at least 1106 psia.

Controls in the MCR operate to cause the components listed in Table 2.4.1-1 to perform the listed functions.

Testing was performed as documented in ITAAC Technical Report SV4-FWS-ITR-801493 (Reference 3) to verify that controls exist in the MCR, and the controls operate to cause the components listed in Table 2.4.1-1 (Attachment A) to perform the listed functions.

The component test began with the components in Attachment A in the closed position or shutdown condition. An operator was stationed locally to monitor and verify component actuations. The A startup feedwater pump was started using PLS controls and the pump isolation valve was verified to open. The A startup feedwater pump was stopped, and this testing was repeated for the B startup feedwater pump. The test results confirmed that controls in Unit 4 MCR operated to cause the components listed in Table 2.4.1-1 to perform the listed functions.

The displays identified in Table 2.4.1-1 can be retrieved in the MCR.

The inspection was performed and results were documented in ITAAC Technical Report SV4-FWS-ITR-801493 (Reference 3) to verify that the displays identified in Table 2.4.1-1 (Attachment B) could be retrieved in the MCR.

Testing began at an operator work station in the Unit 4 MCR and verified all the displays identified in Attachment B could be retrieved. This confirmed that the displays identified in Table 2.4.1-1 could be retrieved in the Unit 4 MCR.

The completed test results (References 1 through 3) confirmed that each of the startup feedwater pumps provided the required flow to each steam generator system, that the controls in the MCR operated to cause the components listed in Table 2.4.1-1 to perform the listed functions, and that the displays identified in Table 2.4.1-1 could be retrieved in the MCR.

References 1 through 3 are available for NRC inspection as part of the Unit 4 Completion Package (Reference 4).

ITAAC Finding Review

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there were no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC 2.4.01.02 (Reference 4) and is available for NRC review.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC 2.4.01.02 was performed for VEGP Unit 4 and that the prescribed acceptance criteria were met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

References (available for NRC inspection)

1. 4-FWS-ITPP-502, Version 2.0, "Main and Startup Feedwater System (FWS) Hot Functional Test Procedure."
2. SV4-FWS-ITR-800493, Rev. 0, "Unit 4 Recorded Results of Main and Startup Feedwater System (FWS): ITAAC 2.4.01.02 Item 2"
3. SV4-FWS-ITR-801493, Rev. 0, "Unit 4 Recorded Results of Main and Startup Feedwater System (FWS): ITAAC 2.4.01.02 Items 3 and 4"
4. 2.4.01.02-U4-CP-Rev0, ITAAC Completion Package

Attachment A

***Excerpt from COL Appendix C Table 2.4.1-1**

Equipment Name*	Tag No.*	Control Function*
Startup Feedwater Pump A (Motor)	FWS-MP-03A	Start
Startup Feedwater Pump B (Motor)	FWS-MP-03B	Start
Startup Feedwater Pump A Isolation Valve	FWS-PL-V013A	Open
Startup Feedwater Pump B Isolation Valve	FWS-PL-V013B	Open

Attachment B

***Excerpt from COL Appendix C Table 2.4.1-1**

Equipment Name*	Tag No.*	Display*
Startup Feedwater Pump A (Motor)	FWS-MP-03A	Yes (Run Status)
Startup Feedwater Pump B (Motor)	FWS-MP-03B	Yes (Run Status)
Startup Feedwater Pump A Isolation Valve	FWS-PL-V013A	Yes (Valve Position)
Startup Feedwater Pump B Isolation Valve	FWS-PL-V013B	Yes (Valve Position)